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12 EPIC GAMES, INC.,
13 Plaintiff, Counter-Defendant,
14 v.
15 APPLE INC.,
16
17 Defendant. Counterclaimant.

Case No. 4:20-cv-05640-YGR

Honorable Yvonne Gonzalez Rogers

**DECLARATION OF ERICK
CHANG IN SUPPORT OF
NONPARTY KABAM, INC.'S
ADMINISTRATIVE MOTION TO
SEAL CERTAIN TRIAL EXHIBITS
OF PLAINTIFF EPIC GAMES, INC.**

20 I, Erick Chang, declare as follows:

1 1. I am Legal Counsel for Kabam Games, Inc., a wholly-owned
2 subsidiary of Kabam, Inc. (“Kabam”). I am over eighteen years of age. I make this
3 declaration based on my personal knowledge and pursuant to Civil Local Rule 79-
4 5 in support of Kabam’s motion to maintain the information described below under
5 seal. If called as a witness, I could and would testify competently to all facts stated
6 herein as follows:

27 2. Epic Games, Inc.'s Exhibits PX0067 and PX2204 contain highly
28 sensitive, and competitively-valuable information, including, *inter alia*, internal

1 2. Epic Games, Inc.'s Exhibits PX0067 and PX2204 contain highly
 2 sensitive, and competitively-valuable information, including, *inter alia*, internal
 3 business strategies and analysis regarding Kabam's user transactions, confidential
 4 financial data, as well as private information relating to Kabam's strategic
 5 partnerships, the release of which would harm Kabam, a non-party.

6 3. Specifically, the documents:

- 7 a. reflect confidential, internal proprietary efforts by Kabam to
 combat fraudulent transactions and future strategies to be
 implemented regarding same (*see, e.g.*, PX0067, PX2204);
- 8 b. provide confidential details regarding products produced by
 Kabam that have not yet been publicly launched (*see, e.g.*,
 PX0067);
- 9 c. reference sensitive and confidential business information,
 including financial data relating to customer purchases and
 accounting issues (*see, e.g.*, PX0067, PX2204);
- 10 d. reveal the details of Kabam's strategic partnerships, which
 could cause harm both to Kabam and its parent company,
 Netmarble Corp. (*see, e.g.*, PX0067, PX2204); and
- 11 e. contain highly-sensitive gross revenue data, which can be easily
 calculated by reverse-engineering certain figures therein (*see,*
 e.g., PX0067).

12 4. The public disclosure of Exhibits PX0067 and PX2204 would likely
 13 have the effect of causing Kabam substantial competitive harm, and could
 14 potentially thwart its efforts to combat fraud, significantly damage its business
 15 relationships, and allow public access to some of its most sensitive, propriety data.

16 5. Kabam restricts dissemination of this information and takes steps to
 17 preserve its confidentiality to protect competitive advantage with regard to key
 18 distribution platforms.

1 6. I declare under penalty of perjury that the foregoing is true and
2 correct. This declaration was executed this 30th day of April 2021, in Vancouver,
3 Canada.

DocuSigned by:

Erick Chang
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Erick Chang

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